

Web Policy pursuant to Articles 13 and 14 of Regulation (EU) 2016/679

With this document ("Policy"), the Data Controller, as defined below, wishes to inform you about the purposes and procedures for processing your personal data and about your rights under Regulation (EU) 2016/679 on the protection of natural persons during the processing of their personal data and on the free movement of the data ("GDPR"). This Policy sheet may be supplemented by the Data Controller in the event that you request any additional services that involve further processing.

1. Data Controller, Data Processor and DPO

The Data Controller is METALTECNICA SRL VAT / Tax Code: 01262820036 with registered offices at Via Matteotti, 151 28077 Prato Sesia (Novara) , Italy

The Data Controller and the DPO, also using designated facilities, will take your request and provide you with information, with no undue delay and in any case, within one month of its receipt at the latest, on the actions taken with respect to your request.

Note that if the Data Controller has any doubts about the identity of the natural person making the request, additional information necessary to confirm that identity may be requested.

Categories of Interested Parties: Natural persons, legal persons and public or private organisations.

2. Processing

2.1. WEB

PROCESSING: WEB - SENDING A CURRICULUM VITA

In the "Work with us" section, you can provide the Data Controller with your personal and professional details (CV) to apply for open positions or for any future openings. Your personal data will be processed exclusively for the selection process and related activities.

Processing Purpose

Legal Processing Condition	Purpose	Description
Consent	Send your CV through the appropriate section of the company website.	Send your CV through the appropriate section of the company website.

Nature of the conveyance: Mandatory

Consequences of the refusal to convey the data: Failure to give your consent will make it impossible for the Data Controller to receive and evaluate your CV or to perform any activities relating to the management of your application.

Minimum data protection measures: Appropriate IT measures have been taken such as access to assets using unique credentials, anti-virus programs and firewalls to ensure high standards of protection.

Personal data retention period: Your personal data will be actively processed for the duration of the Selection. The data will also be kept for 12 months from receipt or failure of a selection, so that your profile may be considered for future openings.

Processing Reference Regulations: The legal basis for registration on the website and the provision of related services is the need to fulfil your request, pursuant to Article 6, point 1, letter b), GDPR. Therefore, it is not necessary to obtain your prior consent for processing.

Process Recipients:

METALTECNICA SRL VAT / Tax Code: 01262820036 - Via Matteotti, 151 28077 Prato Sesia (Novara) ,Italy - 011.966.16.26 , info@metaltecnicazanolo.it

Types of data processed:

Category	Type
Common data	Professional Curriculum Vitae
Common data	Personal details

2.2. WEB

PROCESSING: WEB - REGISTRATION AND ACCESS TO RESERVED AREA

The Data Controller will use your personal details to fulfil your request to register on the website and to provide services related to its reserved area.

Processing Purpose

Legal Processing Condition	Purpose	Description
Contract Performance	Registration and access to reserved area.	Registration and access to reserved area.

Nature of the conveyance: Mandatory

Consequences of the refusal to convey the data: Failure to provide the requested data will stop the website registration process.

Minimum data protection measures: Appropriate IT measures have been taken such as access to assets using unique credentials, anti-virus programs and firewalls to ensure high standards of protection. On paper, the data resides in special locked cabinets, accessible only to authorized personnel.

Personal data retention period: The Data Controller will process your personal data only for the time necessary to manage the contract between you and the Data Controller. In any event, your personal data will be retained for no more than 10 years from the termination of the contract.

Processing Reference Regulations: The legal basis for registration on the website and the provision of related services is the need to fulfil your request, pursuant to Article 6, point 1, letter b), GDPR. Therefore, it is not necessary to obtain your prior consent for processing.

Process Recipients:

METALTECNICA SRL VAT / Tax Code: 01262820036 - Via Matteotti, 151 28077 Prato Sesia (Novara), Italy - 011.966.16.26 , info@metaltecnicazanolo.it

Types of data processed:

Category	Type
Common data	Personal details

3. Cookie Policy:

3.1. Extended Cookie Policy:

On this site we use technology to collect information to improve your online experience. This policy refers to the use of cookies and the procedures we use to manage them.

We reserve the right to change this policy at any time. Any change in this policy shall take effect on the date of its publication on this website.

Cookies are small text strings that the websites you visit send to your terminal (usually your web browser), where they are saved. They are sent back to the sites the next time that same user visits that same site.

While browsing a site, a user may also receive cookies on his or her terminal sent by different websites or servers (so-called "third parties"), where certain elements may reside (e.g., images, maps, sounds, specific links to pages of other domains) on the site being visited.

Cookies, usually found in users' browsers in very large numbers and sometimes characterised by an extended temporal persistence, are used for different purposes, such as computer authentication, session monitoring, information storage for specific configurations regarding user server access, etc.

To properly regulate these devices, they need to be distinguished, as they are not precisely differentiated, one from another, by technical characteristics based on the purposes pursued by those who use them.

- **FIRST-PARTY technical (session) cookies, persistent**

Session cookies are used only for "transmitting a message over an electronic communications network, or to the extent strictly necessary for the provider of a WEB service, explicitly requested by a user to provide such a service". They are not used for other purposes and are normally installed directly by the website owner or operator. These can be divided into navigation or session cookies, which ensure normal navigation and use of the website (e.g. permitting purchases to be made or access to reserved areas to be authenticated). This site uses first-party persistent session cookies.

- **FIRST-PARTY analytics cookies**

Analytics cookies, also called "analytics", make it possible to create detailed statistics on visitors to a website such as, for example, the display of certain pages, the number of visitors, the time spent on the site by users and how they arrived. Analytics cookies are assimilated with session cookies when they are used directly by the site operator to collect information in aggregate form on the number of users and on how they visit the site. This site uses first-party analytics cookies.

- **FIRST-PARTY profiling cookies**

Profiling cookies are designed to create user profiles and are used to send advertising messages in line with the preferences expressed by the user when browsing the web. These devices may be especially invasive of the privacy of users. This website may share this information with other parties, such as advertisers. European and Italian law provides that you may refuse consent to the use of these cookies. This site uses FIRST-PARTY profiling cookies.

- **THIRD-PARTY analytic cookies**

Analytics cookies, also called "analytics", make it possible to create detailed statistics on visitors to a website such as,

for example, the display of certain pages, the number of visitors, the time spent on the site by users and how they arrived. This site uses a web analytics service provided by Google.

- **THIRD-PARTY profiling cookies**

To provide you with additional features and services within this site, we work with third parties who may use their cookies to collect information about your activities while browsing the pages in this site, independently and outside of our control. This information may be used to provide you with advertising aligned with your interests, based on the content you visit, or to measure the effectiveness of advertising campaigns. These cookies may be contained in different elements found inside the web page, such as advertising banners, images, videos, etc. A significant example is the presence of so-called “social plugins” or “social sharing buttons” from the main social networks (Facebook, Twitter, Google+ and LinkedIn), aimed at sharing the contents of the web pages on the social networks themselves. The use of data collected through third-party cookies, over which we exercise no control, is governed by the applicable policy, which we ask you to refer to. This site uses THIRD-PARTY profiling cookies.

Cookies Management

Below is a list of the most common browsers with links to their settings for managing cookies:

- [Internet Explorer 8 and higher](#)
- [Safari 2 or higher](#)
- [Opera 10.5 and higher;](#)
- [FireFox 3.5 and higher;](#)
- [Google Chrome 10 and higher;](#)

Browsers have a “private” mode of navigation, which when activated cause any cookies to be deleted after each browsing session is closed.

Secondly, third-party profiling cookies can be disabled by visiting <http://www.youronlinechoices.com>.

Google Analytics analysis cookies can be disabled by downloading the Google Analytics deactivation browser add-on at the following web address: <https://tools.google.com/dlpage/gaoptout>.

Third party Cookie Policy

Cookie Policy Facebook <https://it-it.facebook.com/policies/cookies/>

Cookie Policy Google <https://www.google.it/intl/it/policies/technologies/cookies/>

Cookie Policy Google <https://www.linkedin.com/legal/cookie-policy>

Cookie Policy Twitter <https://twitter.com/it/privacy>

Granting Consent to Use Cookies

By continuing to browse starting from the banner containing the so-called short policy notice, scrolling through this page or clicking on any of its elements, you consent to the use of cookies used on this website by accepting the policy on cookies described above. You can always withdraw your previous consent in the manner indicated in the section entitled “COOKIE MANAGEMENT”.

3.2. **Site cookies:** To view all cookies used on this site click on <https://webcookies.org/scan/19012643>

3.3. **Types of Cookies active on the site:**

Types of Cookies

First party- session - persistent

3.4. **List of Web Services:**

Type of Service	Description
Social Media Buttons and WidGets	Google+ Button +1 and widgets
Social Media Buttons and WidGets	Linkedin Button and widgets
Social Media Buttons and WidGets	Facebook Like button and WidGets
Social Media Buttons and WidGets	Tweet button and Twitter widgets
Registration and Authentication	Registration with Form

4. What rights do you have as the data subject?

As provided for by European Regulation 679/2016, as data subject, you may, exercise the rights set out in Articles 15 to 21 in relation to the processing operations described in this Policy Notice; specifically:

- **Right of access** – Article 15 GDPR: the right to obtain confirmation that personal data concerning you are or are not being processed and, if so, to obtain access to your personal data, including a copy thereof.
- **Right to rectification** – Article 16 GDPR: the right to obtain, without undue delay, the rectification of inaccurate personal data concerning you and/or to supplement incomplete personal data;

- **Right to erasure** (right to be forgotten) – Article 17 GDPR: the right to obtain, without undue delay, erasure of personal data relating to you.
- **Right to restriction of processing** – Article 18 GDPR: the right to obtain restriction of processing, when:
 1. the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
 2. the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
 3. the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
 4. the data subject has objected to processing pursuant to Article 21(1) GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.
- **Right to data portability** – Article 20 GDPR: the right to receive, the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, if the processing is based on consent and is carried out by automated means. In addition, the right to have your personal data transmitted directly from the Bank to another data controller if this is technically feasible;
- **Right to object** – Article 21 GDPR: the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on the condition of the legality of legitimate interest or the performance of a task carried out in the public interest or the exercise of official authority, including profiling, unless there are legitimate grounds for the Data Controller to continue processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of a right in court; the data subject may object to the processing at any time if the personal data are processed for direct marketing purposes, including profiling, to the extent that it is related to such direct marketing;

The above rights may be exercised, against the Data Controller, by contacting the references cited above.

The exercise of your rights as a data subject is free of charge, pursuant to Article 12 GDPR. Nevertheless, in the event of clearly unfounded or excessive requests, including repetitiveness, the Data Controller may charge you a reasonable fee, to cover administrative costs incurred in its handling, or deny the fulfilment of your request.

- **RIGHT OF REVOCATION:**

Withdrawal of consent - at any time, as easily as it was given, without prejudice to the lawfulness of processing based on consent given prior to its withdrawal.

- **RIGHT TO LODGE A COMPLAINT:**

The data subject has the right to lodge a complaint with the Personal Data Protection Authority, Piazza di Montecitorio no. 121, 00186, Rome (RM).

Customer/Supplier Policy pursuant to Articles 13 and 14 of Regulation (EU) 2016/679

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1. Data Controller, Data Processor and DPO

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The Data Controller and the DPO, also using designated facilities, will take your request and provide you with information, with no undue delay and in any case, within one month of its receipt at the latest, on the actions taken with respect to your request.

Note that if the Data Controller has any doubts about the identity of the natural person making the request, additional information necessary to confirm that identity may be requested.

Categories of Interested Parties: Natural persons, legal persons and public or private organisations.

2. Processing

2.1. Performance of the Contract - Use of the Service

PROCESSING: MANAGEMENT OF THE DATA FROM CUSTOMERS, SUPPLIERS AND PROFESSIONALS

Your personal data must be processed to acquire preliminary information before the execution, conclusion and performance of contracts that you enter into with the Data Controller.

Processing Purpose



Legal Processing Condition	Purpose	Description
Contract Performance	Supplier Management.	Supplier Management.
Contract Performance	Customer Management.	Customer Management.

Nature of the conveyance: Optional

Consequences of the refusal to convey the data: If you do not give your consent to the processing of your sensitive data, it will be impossible for the Data Controller to perform the activities involving the processing of your data for the purposes indicated.

Minimum data protection measures: Appropriate IT measures have been taken such as access to assets using unique credentials, anti-virus programs and firewalls to ensure high standards of protection. On paper, the data resides in special locked cabinets, accessible only to authorized personnel.

Personal data retention period: Your personal data will be actively processed for the time required to manage the current relationship and/or contract performance. In case of failure to complete the contract, the information collected for evaluation of its conclusion will be deleted within ten years.

Process Recipients:

METALTECNICA SRL VAT / Tax Code: 01262820036 - Via Matteotti, 151 28077 Prato Sesia (Novara) , Italy - 011.966.16.26 , info@metaltecnicazanolo.it

Types of data processed:

Category	Type
Economic Data	Fiscal
Economic Data	Banking
Common data	Personal details

2.2. Performance of the Contract - Use of the Service

PROCESSING: USE OF THE SERVICE

Your personal data must be processed to acquire preliminary information before the execution, conclusion and performance of contracts that you enter into with the Data Controller, which provide for the provision of the service.

Processing Purpose

Legal Processing Condition	Purpose	Description
Contract Performance	Contractual Agreements	Contractual Agreements

Nature of the conveyance: Mandatory

Consequences of the refusal to convey the data: Failure to provide the data will make it impossible for the company to comply with your pre-contractual/contractual requests or to perform the contract.

Minimum data protection measures: Appropriate IT measures have been taken such as access to assets using unique credentials, anti-virus programs and firewalls to ensure high standards of protection. On paper, the data resides in special locked cabinets, accessible only to authorized personnel.

Personal data retention period: Your personal data will be actively processed for the time required to manage the current relationship and/or contract performance. In case of failure to complete the contract, the information collected for evaluation of its conclusion will be deleted within ten years.

Processing Reference Regulations: Performance of the contract's pre-contractual measures.

Process Recipients:

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Types of data processed:

Category	Type
Common data	Personal details
Economic Data	Fiscal

2.3. Legal obligations

PROCESSING: COMPLIANCE WITH THE LAW

The processing of your personal data by the Data Controller may also be connected with the fulfilment of obligations provided for by law, regulations and/or EU legislation, or by supervisory and control bodies or other authorities.

Processing Purpose

Legal Processing Condition	Purpose	Description
Legal obligation	Legal obligations.	Legal obligations.

Nature of the conveyance: Mandatory

Consequences of the refusal to convey the data: Failure to provide the data will make it impossible for the Data Controller to perform the activities you requested. This performance assumes the same Data Controller's compliance with those legal obligations.

Minimum data protection measures: Appropriate IT measures have been taken such as access to assets using unique credentials, anti-virus programs and firewalls to ensure high standards of protection. On paper, the data resides in special locked cabinets, accessible only to authorized personnel.

Personal data retention period: Your personal data will be processed for these purposes for the time necessary for the fulfilment of the legal obligations provided for by current applicable legislation. In this regard, your personal data will be retained for 10 years from the termination of the contract or, if afterward, by a binding decision issued by a competent authority (e.g. court judgment), notwithstanding any retention obligations for longer periods concerning specific categories of data required by law.

Processing Reference Regulations: Compliance with a legal obligation.

Process Recipients:

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Types of data processed:

Category	Type
Common data	Personal details

Category	Type
Economic Data	Fiscal
Economic Data	Income

2.4. Marketing

PROCESSING: DIRECT MARKETING

The Data Controller intends to process your personal data in order to send you commercial communications concerning the Data Controller's products and services, including direct marketing conducted using the results of analysis or profiling, as well as continuing with direct sales and the performance of surveys or market research.

Processing Purpose

Legal Processing Condition	Purpose	Description
Consent	Explicit consent.	Explicit consent.

Nature of the conveyance: Optional

Consequences of the refusal to convey the data: Failure to provide consent to convey your data will not affect the fulfilment of your requests or the performance of the contracts, however, the Data Controller will not be able to send you marketing communications.

Minimum data protection measures: Appropriate IT measures have been taken such as access to assets using unique credentials, anti-virus programs and firewalls to ensure high standards of protection. On paper, the data resides in special locked cabinets, accessible only to authorized personnel.

Personal data retention period: Your personal data, processed as described, will be deleted within 30 days from the termination of your last contractual obligation with the Data Controller. In any event, if you decide to withdraw your consent or to object to the processing, your personal data will be deleted within 30 days of your request.

Processing Reference Regulations: a) The data subject's express consent, b) Article 130, point 4, of the Privacy Code, c) The data subject's express consent.

Process Recipients:

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Types of data processed:

Category	Type
Common data	Personal details

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 2. the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
 3. the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
 4. the data subject has objected to processing pursuant to Article 21(1) GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.
- **Right to data portability** – Article 20 GDPR: the right to receive, the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and the right to transmit those data to another controller without hindrance from the controller to which the personal data have been

provided, if the processing is based on consent and is carried out by automated means. In addition, the right to have your personal data transmitted directly from the Bank to another data controller if this is technically feasible;

- **Right to object** – Article 21 GDPR: the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on the condition of the legality of legitimate interest or the performance of a task carried out in the public interest or the exercise of official authority, including profiling, unless there are legitimate grounds for the Data Controller to continue processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of a right in court; the data subject may object to the processing at any time if the personal data are processed for direct marketing purposes, including profiling, to the extent that it is related to such direct marketing;

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- **RIGHT OF REVOCATION:**

Withdrawal of consent - at any time, as easily as it was given, without prejudice to the lawfulness of processing based on consent given prior to its withdrawal.

- **RIGHT TO LODGE A COMPLAINT:**

The data subject has the right to lodge a complaint with the Personal Data Protection Authority, Piazza di Montecitorio no. 121, 00186, Rome (RM).